REMARKS

Favorable reconsideration of this application, as presently amended and in light of the following discussion, is respectfully requested.

Claims 1 and 3-18 are currently pending. Claims 1 and 10 have been amended by the present amendment. The changes to the claims are supported by the originally filed specification and do not add new matter.

In the outstanding Office Action, Claims 1, 3-7, 10-13 and 15-18 were rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 5,899,614 to Maeda et al. (hereinafter "the '614 patent") in view of European Patent Application No. EP 0945780 to Ando et al. (hereinafter "the '780 application"); and Claims 8, 9, and 14 were allowed.

Amended Claim 1 is directed to a command data conversion device for use in a printing system, comprising: (1) a command interpreter that receives command data including commands to be used in print control and associated data, and interprets contents of the print command data; and (2) a processor that receives at least either of the commands and the associated data and executes prescribed processing. Further, amended Claim 1 recites that the command interpreter has command registers that can store multiple commands, wherein the command registers are rewritable memories and one of the multiple commands stored in the command registers can be replaced with a new command when a code of the one command has changed, wherein the one command is commonly used for a same type of printing system. The changes to Claim 1 are supported by the originally filed specification and do not add new matter.

Regarding the rejection of Claim 1 under 35 U.S.C. § 103, the Office Action asserts that the '614 patent discloses everything in Claim 1 with the exception "that the command is commonly used for a same type of printing system," and relies on the '780 application to remedy that deficiency.

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The '614 patent is directed to a print control apparatus that analyzes print data received from an external apparatus, generates output data based on the analyzed print data, and controls a print apparatus to print the output data. As shown in Figure 1, the '614 patent discloses a host computer 1 connected to output units 2 and 3. Moreover, the '614 patent discloses that, in order for the host computer to discriminate between the output units 2 and 3, the content of a command table, which is initially identical for each output unit (see Figure 3), is rewritten as shown in Figure 5. Specifically, the first element shown in Figure 5 has been replaced to distinguish output unit 2 from output unit 3. Thus, the '614 patent discloses that the host computer 1 can discriminate between the two output units by sending the appropriate initial command sequence. However, Applicants respectfully submit that the '614 patent fails to disclose a command interpreter that stores multiple commands, wherein one of the multiple commands stored in the command registers can be replaced with a new command when a code of the one command has changed, wherein the one command is commonly used for a same type of printing system, as recited in amended Claim 1. In this regard, Applicants note that the Office Action on page 3 admits that the '614 patent fails to disclose that "the command is commonly used for a same type of printing system." Further, Applicants respectfully submit that the '614 patent fails to disclose that one of the commands stored in the command registers can be replaced when a code of the one command has changed, as recited in Claim 1. Rather, the '614 patent merely discloses the changing of command sequencing, but does not disclose that the code for a command is replaced when a code of the command has changed, as recited in amended Claim 1.

The '780 application is directed to a hardware circuit designed to control a printer, wherein the hardware circuit is interposed between a host machine and a printer and comprises a command analysis circuit that receives a control circuit command from the host machine and determines whether the command is (1) a backend parameter setting command

or (2) a high-order raster image transmission command. In other words, the '780 application

discloses a circuit for determining whether the command received from a host machine is a

backend parameter setting command or a raster image transmission command. However,

Applicants respectfully submit that the '780 application fails to disclose a command

interpreter that has command registers that can store multiple commands, wherein the

command registers are rewritable memories and one of the multiple commands stored in the

command registers can be replaced with a new command <u>when a code of the one command</u>

<u>has changed, wherein the one command is commonly used for a same type of printing</u>

<u>system,</u> as recited in Claim 1. The '780 application does not teach or suggest the replacement

of commands and command registers when a code of one command is changed or that the

replaced command is commonly used for a same type of printing system, as recited in Claim

1.

Thus, no matter how the teachings of the '614 patent and the '780 application are

combined, the combination does not teach or suggest the command interpreter recited in

amended Claim 1. Accordingly, Applicants respectfully submit that the rejection of Claim 1

(and all similarly rejected dependent claims) is rendered moot by the present amendment to

Claim 1.

In the outstanding Office Action, the stated motivation for combining the teachings of

the '614 patent and the '780 application is to "speed the processing of the printer by receiving

the commands that have already been converted and can be utilized by the printer in storing

the commands in the printer for use, so that the printer does not have to perform the

conversions."[1] Further, the Office Action states that this motivation is provided by the '780

application in column 3, line 9 through column 4, line 40 and column 7, line 42 through

column 9, line 56. However, Applicants note that those sections of the '780 application

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[1] See page 3 of the outstanding Office Action.

merely describe the '780 invention. Thus, any advantages gleaned from those passages relate to the invention described in the '780 application. Moreover, Applicants note that the present claims do not recite "receiving commands that have already been converted and can be utilized by the printer..." "so that the printer does not have to perform the conversions." Rather, Claim 1 recites a command interpreter having command registers which are rewritable memories and that commands can be replaced when a code of one command has changed, wherein the commands are commonly used for same type of printing system. Thus, Applicants respectfully submit that the Office Action is simply stating perceived advantages of Applicants' invention (which in reality are unrelated to Applicants' claims), without identifying that, without Applicant's specification, one of ordinary skill in the art would even have thought to address the problem. Accordingly, Applicants respectfully submit that the Office Action has failed to provide adequate motivation for combining the teachings of the '614 patent and the '780 application in the manner suggested in the Office Action.

Independent Claim 10 recites limitations analogous to the limitations recited in amended Claim 1. Moreover, Claim 10 has been amended in a manner analogous to the amendment to Claim 1. Accordingly, for the reasons stated above for the patentability of Claim 1, Applicants respectfully submit that the rejection of Claim 10 (and all similarly rejected dependent claims) is rendered moot by the present amendment to Claim 10.

Thus, it is respectfully submitted that Claims 1 and 10 (and all associated dependent claims) patentably define over any proper combination of the '614 patent and the '780 application.

Consequently, in view of the present amendment and in light of the above discussion,

the outstanding grounds for rejection are believed to have been overcome. The application as

amended herewith is believed to be in condition for formal allowance. An early and

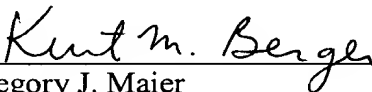favorable action to that effect is respectfully requested.

Respectfully submitted,

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